

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

.....
HMK ENTERPRISES, INC.,)
ROBERT ACKERMAN and)
STEVEN KAROL.,)
)
Plaintiffs,)
)
v.) Civil Action No. 04 12688 MLW
)
FEDERAL INSURANCE)
COMPANY,)
)
Defendant.)
.....

SECOND JOINT MOTION TO CONTINUE STATUS CONFERENCE

HMK Enterprises, Inc., Robert Ackerman and Steven Karol (“Plaintiffs”) and Federal Insurance Company (“Defendant”) hereby jointly move to continue the status conference for 30 days until May 30, 2006, stating as follows:

1. Pursuant to notice from the Court, a status conference in this matter has been scheduled for 10:00 a.m. on April 28, 2006.
2. The parties have agreed to settle their dispute but require additional time to draft the settlement documents before a stipulation of dismissal can be filed.
4. The parties submit that the relief requested herein will not prejudice either party or the Court.

For the foregoing reasons, the parties request that the Court grant their joint motion to continue the status conference until May 30, 2006, by which time the parties expect to file a stipulation of dismissal.

HMK ENTERPRISES, INC.,
ROBERT ACKERMAN and
STEVEN KAROL

FEDERAL INSURANCE COMPANY

By their attorneys,

By its attorneys,

/s/ Martin C. Pentz

Martin C. Pentz (BBO #394050)
Karen L. Crocker (BBO #658838)
Foley Hoag LLP
155 Seaport Boulevard
Boston, MA 02210
(617) 832-1000
mpentz@foleyhoag.com

and

Howard M. Cooper (BBO #543842)
Heidi A. Nadel (BBO #641617)
Todd & Weld, LLP
28 State Street
Boston, MA 02110
(617) 720-2626

/s/ Jonathan A. Constine (by permission (/s/
Martin C. Pentz)

Jonathan A. Constine (*pro hac vice*)
Hogan & Hartson, LLP
555 13th Street, N.W.
Washington, D.C. 20004
(202) 637-5870

and

Stephen J. Abarbanel (BBO #010100)
Lee M. Holland (BBO #650617)
Robinson & Cole LLP
One Boston Place
Boston, MA 02108
(617) 557-5938

Dated: April 26, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 26, 2006.

/s/ Martin C. Pentz
Martin C. Pentz